

EXHIBIT

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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-DCC

DECLARATION OF RANDOLPH ANDERSON

I, Randolph Anderson, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.
2. I am African American. I live in Lawrenceville, Georgia.
3. I attended Black Bike Week four times from 2013 until 2016. I had such a terrible time at Black Bike Week in 2015 and 2016 from the traffic loop and increased police presence that I did not attend Black Bike Week in 2017.
4. When I learned about this lawsuit, I called the NAACP to offer my experience at Black Bike Week. I hope this suit will help change the City's treatment of Black bikers so that bikers like me can enjoy the event again.
5. When I first attended Black Bike Week in 2013, I had an enjoyable time. At that time, there was no traffic loop in place, and I could ride freely on Ocean Boulevard and Kings Highway. I could also more easily navigate Myrtle Beach to meet up with family and friends.

6. I have noticed a definite change in Black Bike Week since Myrtle Beach increased the police presence and put the traffic loop and barricades into place. Since 2015, I have spent hours stuck in the traffic loop.

7. During Black Bike Week 2015, I offered to drop my friend off near the ferris wheel on Ocean Boulevard. The drive should have taken five minutes, but police officers made me take a left out of the hotel parking lot, and I was forced to drive all the way down to the bottom of the strip. Because Ocean Boulevard was limited to one-way, southbound traffic, the drive ended up taking me over an hour and a half.

8. The police presence is also extremely intimidating and keeps me from enjoying the weekend. Once, I was sitting on the sidewalk waiting for a friend and a police officer came over and threatened me with a ticket. I still don't know what it could possibly have been for, since I wasn't doing anything wrong. I am careful to follow traffic rules and the speed limit, and the overwhelming number of police officers feel like an invasion of privacy.

9. At Black Bike Week especially in 2015 and 2016, the police seemed to be in front of every other hotel. They stand in the middle of the road and peer into cars, and it feels like they slow down traffic on purpose just to search everyone. It made me very uncomfortable, and made me want to stay inside my hotel room.

10. I decided to give Black Bike Week one more try in 2016. When I arrived, I discovered that the traffic restrictions and police presence were just as overwhelming as in 2015. I did not enjoy my time at Black Bike Week at all, and I did not want to go out or leave my hotel room.

11. Black Bike Week is supposed to be a riders' convention, but because of the loop, I can't ride. Even though I came to participate in the motorcycle culture, I barely took my bike

out, and the few times I left the hotel, I stayed within walking distance to avoid the traffic. It was so frustrating, and I decided to boycott the event in 2017 because the City had made it so unpleasant.

12. If I come back for Black Bike Week in 2018, I will stay in Atlantic Beach and avoid Myrtle Beach and the loop altogether. I do not feel welcome there.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: April 5, 2018.

BY:


Randolph Anderson